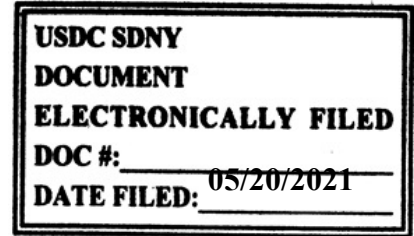


Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 E. 42nd Street, Suite 2020
New York, New York 10165



May 19, 2021

VIA ECF

Hon. Katharine H. Parker
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Mayahua Cuahua et al v. Living Thai Corp et al,
1:20-cv-03713-RA-KHP

APPLICATION GRANTED

Katharine H Parker
Hon. Katharine H. Parker, U.S.M.J.

05/20/2021

Your Honor,

This firm represents Plaintiffs in the above-referenced matter. We write jointly with Defendants to respectfully supplement our May 17, 2021 letter requesting leave to amend the complaint. Dkt. No. 35. Defendants consent to the filing of the Amended Complaint and Defense counsel accepts service. Additionally, the parties respectfully request an extension of time to complete discovery, which is currently scheduled to close on June 1, 2021. Dkt. No. 23.

This is the first request of this kind and no other prior requests for an extension have been made. All parties consent to this application.

The reason for this request is that Plaintiffs' counsel was retained by a newly identified Plaintiff. Defendants consented to the addition of the Plaintiff. Defense counsel accepts service and is to file an answer within 30 days of the Court's approval of the instant request. The parties expect to exchange--with regard to the newly added plaintiff--written discovery, interrogatories and responses, and engage in depositions after Defendants submit their answer to the amended complaint.

For this reason, the parties respectfully request that the deadline for completion of discovery be extended to November 19, 2021.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Michael Faillace

Michael Faillace
MICHAEL FAILLACE & ASSOCIATES, P.C.
Attorneys for the Plaintiffs

Cc: Via ECF

David Seth Halsband
Halsband Law Offices
Court Plaza South, 21 Main Street
East Wing, 3rd Floor, Suite 304
Hackensack, NJ 07601